

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

**DECLARATION OF CHRISTOPHER M. PLACITELLA IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO PERSONAL CARE PRODUCTS
COUNCIL'S MOTION TO DISMISS**

I, Christopher M. Placitella, hereby declare, under penalty of perjury, as follows:

1. I am an attorney at law and member of the firm Cohen, Placitella & Roth, P.C. I am duly licensed to practice in the State of New Jersey and before this Court.
2. I have been appointed by this Court and currently serve as Plaintiffs' Liaison Counsel in the above-captioned matter.
3. Attached hereto as Exhibit A is a true and correct copy of Personal Care Products Council's 2010, Form 990, Return of Organization Exempt From Income Tax.
4. Attached hereto as Exhibit B is a true and correct copy of a Personal Care Products Council publication, 2016: Year In Review.

5. Attached hereto as Exhibit C is a true and correct copy of a [REDACTED]

[REDACTED].

6. Attached hereto as Exhibit D is a true and correct copy of Personal Care Products Council (PCPC) Washington Report Cosmetics, dated March 6, 2017.

7. Attached hereto as Exhibit E is a true and correct copy of portions of The California Safe Cosmetics Act 2005.

8. Attached hereto as Exhibit F is a true and correct copy of [REDACTED]

[REDACTED].

9. Attached hereto as Exhibit G is a true and correct copy of the California Department of Public Health, Occupational Health Branch, California Safe Cosmetics Program, August 1, 2013, Chemicals Known Or Suspected To Cause Cancer Or Reproductive Toxicity.

10. Attached hereto as Exhibit H is a true and correct copy of [REDACTED]

[REDACTED].

11. Attached hereto as Exhibit I is a true and correct copy of Personal Care Products Council: An Animal Cruelty Analysis, April 2010.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Christopher M. Placitella

CHRISTOPHER M. PLACITELLA

Dated: June 19, 2017